

BLM: Bureau of Land Management
Western Oregon Plan Revisions Office
333 SW 1st. Avenue
Portland, Oregon 97208

January 11, 2008



Dear BLM,

The Environmental Protection Information Center and the Klamath Forest Alliance of Northern California submit these comments concerning the **Western Oregon Plan Revisions**.

We are very concerned with the direction the Administration is taking with the Western Oregon Plan Revisions, which will dramatically alter the management framework for nearly 2.6 million acres of federal forests directly affected, and pose serious risks for the approximately 5.4 million acres of federal forests in NW California managed under the Northwest Forest Plan (NWFP). The changes that the BLM is contemplating will unravel the protections of the landmark NWFP, and may lead to water pollution, degraded habitat, and increased conflict and controversy.

Your current proposal is unacceptable and illegal. The agency proposes to increase old-growth logging on public lands in western Oregon by 700%, build 1,000 miles of new logging road in the next decade and clearcut at a 9-1 ratio to thinning. This is a myopic and backwards proposal that depletes our natural resource base for future generations by weakening protections for forests, creeks and salmon. Shockingly, the proposal ignores the role that these forests play in regulating the climate.

The WOPR risks substantially severing Northern California's federal forests from the federal forests in both the Coast Range of Oregon and the Oregon Cascades, as key biological connections between these regions run through the lower-elevation landscape where BLM's forestlands dominate. Habitat fragmentation affects numerous ecological processes. Wildlife populations are vulnerable to collapse in habitat fragments, especially migrating fur-bearers. Movement of wildlife through these linkages ensures that a species can persist in the overall region. Wildlife activities within these corridors include foraging movements, seasonal migrations, and dispersal of juveniles. Additionally, the resultant connectivity between natural core areas fosters genetic exchange among wide-ranging plants and animals, helping to maintain viable populations, while maintaining migratory pathways. The WOPR as it stands will severely affect connectivity in the Pacific Northwest, with the potential for very serious harm to wildlife and forests in California.

The NWFP was created to address the federal government's obligation under the ESA, NFMA, NEPA, and other laws. By proceeding with the changes proposed in the WOPR, the BLM would preclude meeting those obligations under the NWFP.

Our organizations believe federal land managers need to embrace thinning second growth forests, safeguard communities from wildfire and protect what remains of our nation's ancient forests. By focusing on previously logged public forestlands - many of which are now overgrown

and in need of thinning - they are providing wood to local mills while actually improving conditions for fish and wildlife and keeping saws out of precious old-growth forests.

In contrast, the WOPR proposes to inflame the controversy by increasing old-growth clear-cutting for the short-term economic benefit of private industry. We should protect our remaining mature and old-growth forests on public land, not clear-cut these natural treasures as the WOPR proposes to do.

It is disappointing that at a time when public consensus for old-growth protection and second-growth thinning has never been stronger, the BLM is proposing to clear-cut forests older than our nation, turn complex ecosystems into flammable tree farms and push threatened and endangered species toward extinction.

Sincerely,

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